

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

United States of America
v.

VICENTE RODRIGUEZ

Defendant(s)

Case No. 6:25-MJ-004-BU

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 01/31/25 in the county of Mills in the
Northern District of Texas, the defendant(s) violated:

Code Section

Offense Description

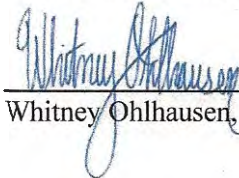
Title 8, United States Code, Section 1326

Illegal Re-entry into the United States of a Removed Alien

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.


Whitney Ohlhausen, AUSA


Complainant's signature

HSI Special Agent Robert A. Parry

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 3.

Date: February 3, 2025


Judge's signature

City and state: Abilene, Texas

John R. Parker, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Robert Parry, being first duly sworn, hereby depose and state as follows:

1. I am currently employed as a Special Agent (SA) with Homeland Security Investigations (HSI) and have been since June of 2016. As such, I am authorized to investigate crimes involving Illegal Re-Entry of After Deportation, pursuant to Title 8, United States Code, Section 1326, and have the authority to affect arrests and execute criminal complaints and warrants issued under the authority of the United States. Prior to becoming an HSI Special Agent, I was employed as a United States Border Patrol Agent for approximately eight years.

2. During my law enforcement career, I have conducted and participated in investigations directly relating to criminal immigration violations, to include Illegal Re-Entry After Deportation. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, law enforcement officers and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested arrest warrant and does not set forth all of my knowledge about this matter.

3. This affidavit is submitted in support of a complaint charging Vicente Rodriguez with violating Title 8, United States Code, Section 1326, which provides that it is a crime for an alien who has been removed from the United States to enter, attempt to enter, or be found in the United States without the Attorney General of the United States or Secretary of Homeland Security's express consent. Any alien who violates this section of law is subject to prosecution for a felony. Depending on the circumstances of

the removal, conviction could result in a sentence of imprisonment for a period of 2 to 20 years and/or a fine of up to \$250,000.

4. As more fully described below, I have probable cause to believe that Vicente Rodriguez re-entered the United States after deportation, in violation of Title 8, United States Code, Section 1326.

STATEMENT OF PROBABLE CAUSE

5. On or about January 31, 2025, a Mills County Sheriff's Deputy requested United States Border Patrol assistance with obtaining the identity of a subject they had encountered during a consensual encounter. A United States Border Patrol Agent assisted and determined the identity of the subject to be Vicente Rodriguez. The United States Border Patrol Agent determined that Rodriguez was a citizen and national of Mexico that did not have legal standing to be in or remain in the United States and that he had previously been removed from the United States on August 13, 2015. An immigration detainer was placed on Rodriguez.

6. Subsequent to the immigration detainer being placed, Rodriguez was processed, and full biometric record checks were conducted revealing that he was an illegal alien who had been previously deported from the United States on or about August 13, 2015, at the Port of Departure in Laredo, Texas. After being deported, Rodriguez illegally re-entered into the United States at an unknown date and location. Records also indicated that Rodriguez had not received permission from the Attorney General or the Secretary of Homeland Security to apply for readmission to the United States.

7. On February 3, 2025, a Homeland Security Investigations (HSI) Special Agents were notified of Rodriguez's detention. HSI confirmed he had several prior removals from 2010-2015.

8. I believe, based upon the facts contained herein and previous training and experience, that there is probable cause to believe that Vicente Rodriguez violated Title 8, United States Code, Section 1326.



Special Agent Robert A. Parry
Homeland Security Investigations

Pursuant to Federal Rules of Criminal Procedure 4.1 and 41(d)(3), the undersigned judicial officer has on this date considered the information communicated by reliable electronic means in considering whether a complaint, warrant, or summons will issue. In doing so, I have placed the affiant under oath, and the affiant has confirmed that the signatures on the complaint, warrant, or summons and affidavit are those of the affiant, that the document received by me is a correct and complete copy of the document submitted by the affiant, and that the information contained in the complaint, warrant, or summons and affidavit is true and correct to the best of the affiant's knowledge.

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone this 3rd day of February 2025.



Honorable John R. Parker
United States Magistrate Judge